

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title: Award of available spectrum: 10GHz, 28GHz, 32GHz and 40GHz
Spectrum Packaging and Auction Design

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Name ___Murray Niman G6JYB___ Signed (if hard copy)

Award of Spectrum in the 10GHz, 28GHz, 32GHz and 40GHz Bands: Spectrum Packaging and Auction Design

**Joint response from the Radio Society of Great Britain,
UK Microwave Group, Amsat-UK and BATC.**

February 8th 2007



Introduction

This response is a joint one to the above Ofcom discussion document from the Radio Society of Great Britain (RSGB, www.rsgb.org.uk) and its national affiliates who have microwave spectrum interests - Amsat-UK (www.uk.amsat.org), UK Microwave Group (UKuG, www.microwavers.org), and the British Amateur Television Club (BATC, www.batc.org.uk). In addition we acknowledge contributions on Amateur Satellite data from international Amsat Societies as part of a broad team effort.

RSGB is recognised as one of the leading organisations in the world in the field of amateur radio. It collaborates with its fellow national societies via the International Amateur Radio Union (IARU) through IARU Region-1 (www.iaru-r1.org).

Amateur radio is a science based technical hobby enjoyed by over three million people worldwide. From a statutory point of view it is fully recognised by the International Telecommunication Union (ITU) as a Service and is listed in the ITU Radio Regulations as the Amateur Service and the Amateur-Satellite Service.

We thank Ofcom for this further opportunity to comment, and look forward to a fuller Ofcom response to the original 2006 consultation, including our submission at the time.

We would be pleased to provide any additional information on request or participate in any future discussions, both with Ofcom and any other stakeholder who has an interest in these bands.

Permission is granted for a copy of this response to placed in the public domain

RSGB, Amsat-UK, UKuG & BATC, February 2007

Discussion Document Comments

The comments below are in the same order as the discussion document structure

1. Spectrum Packaging Comments

We note that a number of changes are proposed which we summarise as:-

| Band, GHz | Frequency | Original Package | Amended Proposal |
|-----------|-----------------------------------|--------------------------------------|-------------------------|
| 10 | 10.125 -10.225 & 10.475 -10.525 | Single 2 x 100MHz lot | Ten 2 x 10MHz lots |
| 28 | ~27.8 – 29.4 | Various 112MHz lots | No change |
| 32 | 31.815 - 32.571 & 32.571 - 33.383 | Six 2x126MHz lots | Modified auction format |
| 40 | 40.5-43.5 GHz. | Auction deferred – available for T&D | Six 2 x 250 MHz lots |

In respect of the 10GHz band: We remain profoundly disappointed that this band is on offer, but welcome the new option of narrower (potentially lower power) lots.

In respect of the 28GHz band: No comments beyond our original submission.

In respect of the 32GHz band: We note that the original consultation featured a central 56MHz guard band and that this discussion document does not modify that. As per earlier submissions such potentially fallow spectrum remains of interest for very narrow bandwidth low power amateur propagation experiments on a secondary non-interference basis.

In respect of the 40GHz band: No comments beyond our original submission.

2. Technical Conditions Comments

10GHz:

We recognise that for narrower bandwidth auction lots the EIRP would need to be reduced along the lines in the discussion document. However the update provides no sign that Ofcom's technical conditions will address CEPT Allocation Footnotes EU17/23 or other regulatory guidance that we highlighted in our 2006 submission. We also note that no new detail has been provided in regard of MoD usage in the band, with whom we have successfully shared for many years.

40GHz:

No comment

3. Summary

Whilst the discussion document is a useful insight into Ofcom's latest thinking, it in no way answers our fundamental concerns which in particular threaten leading edge international 10GHz Amateur Satellite developments. We look forward to a fuller response in respect of our original consultation input.

RSGB, Amsat-UK, UKuG & BATC - February 2007.